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April 1, 2024

**Via ECF**

Magistrate Judge André M. Espinosa  
United States District Court  
District of New Jersey  
Martin Luther King, Jr. Building  
50 Walnut Street  
Newark, NJ 07102

Re: *Doremus Land 672 LLC v. Zariz Transport, Inc. et al.*  
Civil Action No. 2:23-cv-02850-ES-AME

Dear Judge Espinosa:

On behalf of plaintiff and defendants, the undersigned counsel submit this joint status letter in response to the Court's Order dated December 27, 2023 ("December 27 Order") [ECF Doc. No. 28].

Defendants' motion to dismiss the Complaint was returnable November 13, 2023 and the Court has not yet issued its decision. In the meantime, pursuant to the Court's December 27 Order, the Rule 16 conference is continued until further order; and discovery remains in in abeyance pending a decision on Defendants' motion to dismiss.

Each party reserves the right to request that the Court conduct a telephone conference to further address the status of this matter before the Court issues its decision on Defendants' motion to dismiss.

Respectfully,

SILLS CUMMIS & GROSS, P.C.  
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